

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,<sup>1</sup>

Debtors.

CELSIUS NETWORK LIMITED and  
CELSIUS KEYFI LLC,

Plaintiffs,

v.

JASON STONE and KEYFI INC.,

Defendants.

Chapter 11

Case No. 22-10964 (MG)

Jointly Administered

Adversary Proceeding  
No. 22-01139 (MG)

**STIPULATED ORDER GOVERNING TAKING OF DEPOSITIONS IN  
CONNECTION WITH MOTION OF PLAINTIFFS FOR PRELIMINARY  
INJUNCTION PURSUANT TO RULE 7065 OF THE FEDERAL RULES OF  
BANKRUPTCY PROCEDURE**

Plaintiffs Celsius Network Limited (“CNL”) and Celsius KeyFi LLC (“Celsius KeyFi,” and together with CNL, “Plaintiffs”), debtors in the above captioned chapter 11 cases, Defendants Jason Stone and KeyFi, Inc. (“KeyFi,” and together with Stone, “Defendants”), and the Official Committee of Unsecured Creditors (“UCC”) in its capacity as a third-party intervenor, (collectively, the “Parties” or individually, a “Party”) hereby enter into this protocol (the “Protocol”).

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network, Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

WHEREAS the Parties have agreed, and the Court orders, pursuant to Rule 29 of the Federal Rules of Civil Procedure and Rule 7029 of the Federal Rules of Bankruptcy Procedure, by and through their undersigned counsel and subject to approval of the United States Bankruptcy Court for the Southern District of New York (the “Court”), to the following terms governing the taking of depositions in connection with the Motion of Plaintiffs for Preliminary Injunction Pursuant to Rule 7065 of the Federal Rules of Bankruptcy Procedure [ECF No. 20] (the “Motion”),<sup>2</sup> in the above-captioned adversary proceeding (the “Adversary Proceeding”):

**IT IS HEREBY STIPULATED, AGREED AND ORDERED THAT:**

1. This Protocol will govern the taking of deposition noticed in connection with the Motion (a “PI Deposition”) as a supplement to the Federal Rules of Civil Procedure; Federal Rules of Bankruptcy Procedure, Local Rules for the United States Bankruptcy Court for the Southern District of New York; and the Case Management and Scheduling Order #1, dated October 26, 2022 [ECF No. 15].

2. This scope and subject matter of PI Depositions shall be limited to matters relevant to determination of the Motion.

3. PI Depositions shall be limited to one day of four hours in length, provided that the Court may allow additional time for good cause shown.

4. PI Depositions will not count towards the limitations prescribed in Federal Rule of Civil Procedure 30, made applicable to the Adversary Proceeding by Federal Rule of Bankruptcy Procedure 7030, including the presumptive limit of ten depositions per party, durational limit of one day of seven hours for any deposition, or that a deponent may be deposed only once in a case,

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<sup>2</sup> A hearing on the Motion is scheduled to begin on January 11, 2023 at 9:00 a.m. prevailing Eastern Standard Time, with January 12, 2023, reserved in the event that more time is needed.

provided, however, that nothing herein shall limit the Parties' respective rights to object at any deposition, including on the basis that questioning is unduly duplicative of questioning that occurred at a PI Deposition.

5. This Stipulation and Order shall be effective and enforceable immediately upon entry.

*[Remainder of page intentionally left blank]*

**SO STIPULATED:**

Dated: December 16, 2022  
New York, New York

/s/ Mitchell P. Hurley

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Celsius Network Limited and  
Celsius KeyFi LLC*

**IT IS SO ORDERED.**

Dated: December 16, 2022  
New York, New York

/s/ Martin Glenn

MARTIN GLENN  
Chief United States Bankruptcy Judge